

EXHIBIT D

**Exhibit A – Personal Injury / School District Plaintiffs and Attorneys General Plaintiffs
Proposed Bellwether Case Management Schedule**

In re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation | Case No. 4:22-md-03047-YGR

Event	Deadline Pursuant to Standing Order in Civil Cases (Where Applicable)	PI/SD Plaintiffs and AG Plaintiffs Proposed Dates (Dates to which all Plaintiffs and Defendants agree are highlighted)
Dates Applicable to PI/SD Plaintiffs Only		
Plaintiff Fact Sheets for PI/SD Cases	No Standing Order	May 13, 2024 (105 Days from Entry of CMO 8) ¹
Selection of Bellwether Discovery Pools	No Standing Order	July 12, 2024
PI/SD Plaintiffs and Defendants to Submit Simultaneous Briefing Identifying 12 Cases from Each Bellwether Discovery Pool to Select For Trial	No Standing Order	January 24, 2025
Dates Applicable to All Parties		
Close of Fact Discovery	No Standing Order	January 23, 2025 (partial agreement) ²
Plaintiffs' Expert Reports	No Standing Order	February 27, 2025
Defendants' Expert Reports	No Standing Order	March 27, 2025
Mutual Exchange of Rebuttal Expert Reports	No Standing Order	April 24, 2025
Close of Expert Discovery	No Standing Order	May 30, 2025
First Bellwether Trial Dispositive/ <i>Daubert</i> Motions ³	No Standing Order	June 27, 2025

¹ Plaintiffs note that in CMO 8, the Court Granted the Proposed Implementation Order but the Order's entry is not yet reflected on the Docket, so the dates noted here in are approximate.

² Plaintiffs propose this date as the cut-off for all fact discovery, both general and case-specific. Defendants propose it as the end of fact discovery of Defendants and the end of "core" case-specific fact discovery, with "non-core" case-specific discovery continuing thereafter.

³ The Parties respectfully request that the Court's Pre-Filing Conference requirement be waived. See Standing Order in Civil Cases, at § 9.a. The Court's requirements and rules regarding summary judgement and *Daubert* motions otherwise apply. See Standing Order in Civil Cases, at § 9, 11.

Event	Deadline Pursuant to Standing Order in Civil Cases (Where Applicable)	PI/SD Plaintiffs and AG Plaintiffs Proposed Dates (Dates to which all Plaintiffs and Defendants agree are highlighted)
Oppositions and Cross-Motion Briefs to First Bellwether Trial Dispositive/ <i>Daubert</i> Motions	14 days after filing of opening brief	July 18, 2025
Reply Briefs to First Bellwether Trial Dispositive/ <i>Daubert</i> Motions	7 days after filing of oppositions	August 1, 2025
<u>Motions in Limine Exchange</u>	<u>28 days prior to Pretrial Conference</u>	<u>August 8, 2025</u>
Exhibit Exchange	28 days prior to Pretrial Conference	August <u>8</u> , 2025
Written Transcript of All Exhibit Audio or Video Recordings to Opposing Counsel	28 days prior to Pretrial Conference	August <u>8</u> , 2025
<u>Motions in Limine Exchange</u>	<u>28 days prior to Pretrial Conference</u>	<u>August 8, 2025</u>
Deadline for Parties to conduct Pretrial Conference Statement Meet and Confer	21 days prior to Pretrial Conference	August <u>15</u> <u>11</u> , 2025
Deadline to file Compliance Joint Statement re Pretrial Conference Statement Meet and Confer	5 days before Compliance Deadline for Pretrial Meet and Confer	August <u>10</u> <u>13</u> , 2025
Motions in Limine	15 days prior to Pretrial Conference	August <u>21</u> <u>13</u> , 2025
Compliance Deadline for Pretrial Meet and Confer	5 days after Deadline for Parties to conduct Pretrial Conference Statement Meet and Confer	<u>July</u> <u>August</u> <u>16</u> <u>18</u> , 2025

Event	Deadline Pursuant to Standing Order in Civil Cases (Where Applicable)	PI/SD Plaintiffs and AG Plaintiffs Proposed Dates (Dates to which all Plaintiffs and Defendants agree are highlighted)
Oppositions to Motions in Limine	16 days prior to Pretrial Conference	August 20, 2025
Pretrial Conference Statement	15 days prior to Pretrial Conference	August 21, 2025
Trial Readiness Filings and Binder	14 days prior to Pretrial Conference	August 22, 2025
Pretrial Conference	Third Friday preceding trial	September 5, 2025
Copies of Exhibits to the Court	Friday prior to the trial date	September 19, 2025
Anticipated Trial Date for First Bellwether Case	The Monday approximately 4 months after the expert discovery cutoff	September 22, 2025